



Office of Colin C. Collins

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March 15, 2005

Mr. Deepak Joshi
Lead Aerospace Engineer (Structures)
National Transportation Safety Board
Room 5235
490 L'Enfant Plaza, S.W.
Washington, D.C. 20594

Dear Mr. Joshi,

Air Evac Lifeteam, a Part 135 air ambulance company located in West Plains, Missouri would like to support HAI's position on the NPRM 427, Proposed Rules 49 CFR Part 830, Notification and Reporting of Aircraft Accidents or Incidents and Overdue Aircraft and Preservation of Aircraft Wreckage, Mail, Cargo, and Records.

Air Evac Lifeteam supports HAI's position and is as equally concerned about the proposal to amend Section 830.2 by removing reference to ground damage to helicopter rotor blades from the list of exclusions to the definition of "substantial damage". By the very nature of a helicopter's operating environment, the potential for some form of damage to the rotor blades is much more significant than that of an airplane. As HAI stated the analogy between a helicopter rotor blades and that of an airplane's wings are not same and should not be viewed the same.

Any significant downtime created by the preservation of an aircraft after such a ground strike awaiting NTSB review of the event is in our opinion un-needed. Maintenance procedures from the helicopter's manufacturer deal with rotor strikes and what corrective action needs to occur. This guidance is more than sufficient for a ground strike. We agree if damage to the drive train and/or airframe is also incurred during a ground strike, then an investigation should happen, but to automatically place the helicopter into an accident category because of a ground strike is not in the best interest of the proposed regulation.

Air Evac Lifeteam also believes that factual information concerning true accidents would be artificially inflated by the inclusion of rotor blade ground strikes in the total accident numbers for evaluation. To be able to better understand the issues surrounding today's

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helicopter accidents and incidents, this particular statistic does not need to be part of the overall picture.

Thank you for allowing us to share our views with you on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin C. Collins', written in a cursive style.

Colin C. Collins
President